UNITED STATES DISTRICT COURT		
SOUTHERN DISTRICT OF NEW YORK		
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EIMONT BRONZINI,	: (Civil Action No. 11 Civ. 2096 (KBF)
Plaintiff,	:	1
- v -	:	CODNY
	:	USDC SDNY DOCUMENT
CLASSIC SECURITY, LLC,	:	ELECTRONICALLY FILED
Defendant.	:	DATE FILED: 9/21/12
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Letter to the Judge for extension of time of the Discovery Period

Your, Honor, Judge K. B. Forrest, I am Plaintiff, Eimont Bronzini asking You to grant extension of time of the Discovery Period and previously filed Motion to Compel Discovery without as a must to request a conference, because of Your previous practices granting defendant's Motion for Partially Dismissal without held a requested conference. I, Plaintiff would be very happy if You, Your Honor, Judge K.B. Forrest would held a conference before granting or denying Motion to Compel Discovery and extending of time of Discovery Period and would hear for the first time during conference what is the case about from the Plaintiff who is in the case too not only Defendant with his 7 (seven) words/phrases picked from 391 pages and changed into opposite non addressable meanings, changed them into wanted way.

The reasons for granting the Motion to Compel Discovery and extension of Discovery Period are:

- 1. Defendant took one day long Depositions on September 18th,2012 from Plaintiff and on September 19th,2012 under Subpoena took Depositions from Plaintiff's wife/ witness in the case. Transcripts of Depositions will be ready on September 29^{t,h}, 2012 or later and under Rule 30(e) of the Federal Rules of Civil Procedure, once a transcript of a deposition is available, the deponent has thirty (30) days to review the transcript and to make changes in form or substance. This reason to overview in 30 days of deposition's transcripts is so important, because as usually in contest of transcripts of Depositions will be 100% changed all answers into opposite meanings, changed into wanted way as it was in 2008 year by self proclaimed Defendant's 'super lawyer' A.Singer in close cooperation with 'Global..' company's court reporter fraudulently changed 100% all answers into opposite meanings, changed into wanted, what caused for Plaintiff's to correct almost 300 extended pages of corrections.
- 2. Defendant intentionally lied in all Interrogatory answers/responses, what was proffered by # Response to Interrogatory No.21. answer that African-American Mrs. Agnes Foster took her first on-site in July of 2011 as was officially contradicted in
- #Response to Interrogatory No.21 citation: ...'In 2011, two FSD trainees were given their first onsite exam; of which one individual was Hispanic and other was Caucasian –that is proffered lie about all responses.
- 3. Defendant disagreed to provide initial disclosures and to produce most of required documents even when he was asked in good faith by Plaintiff for the second time to do it on September 18,2012 during day of Plaintiff's depositions.
- 3. Plaintiff under Rule 37 (a) (2) filed Motion to Compel Discovery asking Judge to order Defendant to make initial disclosures, to make, to produce required documents, which were requested by Plaintiff, but were refused to produce by Defendant.

DOCUMENT REQUESTS UNDER RULE 37 A MOTION TO COMPEL DISCOVERY

Document Request No. 1

Produce exact documents identified by Defendant in his responses to the interrogatories above or which support in any way Defendant's responses to the interrogatories.

Document Request No. 2

Produce from date of November 3rd, 2010 year through February 11th, 2011 year from Classic Security an Alliance Building Services Company Log Book - ALL PAGES, ALL SHIFTS, ALL ENTRIES - from 80 Broad St. site.

Document Request No. 3 - Defendant produced

Produce 2010/ 2011 year's Classic Security an Alliance Building Services Company Post Orders - ALL PAGES - from 80 Broad St. site.

Document Request No. 4

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails, related to firing/terminating from Classic all of 10 witnesses officially provided in 2008 year's case #07 CV 11104 (HB) by Classic Security LLC to testify against plaintiffs Eimont Bronzini and Lolita Bronzini

Document Request No. 5 -Defendant produced some of them

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails, related to

February 11th, 2011 FSD E.Bronzini's firing /terminating from Classic Security company with NO REASON.

Document Request No. 6

Produce all Classic Security an Alliance of Building Services Company's official E-mails / correspondences, including confidential E-mails, issued after February 11th, 2011 from Union's *Grievance Hearing Procedure*, related to February 11th, 2011 FSD E.Bronzini's firing /terminating from Classic Security company with official NO REASON.

Document Request No. 7

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails about Security Officer's, who worked in 2010/2011 year at 80 Broad st. site (name known by Classic) related to his firing/terminating from Classic for his pissing into the bucket, because basement's toilet was intentionally locked by building engineers, who changed public (employee's) toilet into private restroom/club. Alliance of Building Services Classic Security's office official E-mails / correspondences, including confidential E-mails about

Document Request No. 8

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails, reprimands/write-ups issued about or for FSD Pier Luis who worked at 80 Broad st. site in 2010/2011 years and was fired/terminated from Classic ,because he was caught outside building (abandoned post), when he was looking for toilet in life emergency, because basement's toilet was intentionally locked by building engineers, who changed public (employee's) toilet into private restroom/club.

Document Request No. 9 - partially provided by Defendant

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails, reprimands/write-ups issued about or for FSD Brian Watson, his all on-site tests dates, FDNY summons, documents related to paid by Classic monetary fines for violation of FDNY rules by FSD B.Watson,

who in April of 2008 year abandoned/left 320 E 53 st. site/post- 11 stories residential building.

Document Request No. 10

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails related to On-site test scheduled for January 18th,2011 for uninformed FSD E.Bronzini at 711 3rd Ave. site.

Document Request No. 11

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including all her on-site test dates, all FSD written tests dates at FDNY, Classic's confidential E-mails related to FSD Kimberly Danza ,who worked in 2010/2011 year at 80 Broad st. site.

Document Request No. 12

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including all her on-site test dates, all FSD written tests dates at FDNY, Classic's confidential E-mails related to FSD Agnes Foster ,who worked in 2010/2011 year at 80 Broad st. site.

4. Additional request for produce of documents under Rule 37 in Motion to Compel Discovery is because Defendant refused to answer or intentionally lied to interrogatories and refused to produce required documents:

Document Request No. 13 - Interrogatory No. 21

Identify how many (exact amount) Classic's FSDs did African-American Classic's Director of Operations R. Jessamy gave opportunities to take first their FDNY On-Site Tests in 2008 year; in 2009 year; in 2010 year; in 2011 year - identifying their national origin and Race?

Document Request No. 14 -Interrogatory No. 22

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Identify how many (exact amount) did African-American Classic's Director of

Operations R. Jessamy hired new FSDs in 2008 year; in 2009 year; in 2010 year; in 2011

year - identifying their national origin and Race - for always available FSD work positions

in Classic with starting \$15+ per hour pay rate?

Document Request No. 15 -Interrogatory No. 23

Identify how many (exact amount) African-American Classic's Director of Operations

R. Jessamy hired new Security Officers S/Os in 2008 year; 2009 year; 2010 year; 2011 year

- identifying their national origin and Race - for always available S/O work positions in

Classic?

Document Request No. 16 -Interrogatory No. 25

Identify how many African-American Classic's Director of Operations R.Jessamy

fired/terminated from Classic - with NO REASON during 2009, 2010, 2011 years - starting

with FSD E. Bronzini, FSD Pier Luis, and Security Officer (name known/and hidden by

Classic) - with the same "Classic's Stinky Method" instead of giving them a key to the 80

Broad St. site's basement's toilet, R.Jessamy together with intentionally cooperative

pervertive/corrupted 80 Broad St. site's Engineers, who locked basement's toilet, (making

toilet into their personal club/restroom) - putting the whole 36 (thirty six) stories Building's

tenants into danger, because of the natural/human FSD's emergency need to look for the

toilet outside the building premises?

I, Eimont Bronzini, Plaintiff declare under penalty of perjury that the foregoing is true and

correct.

Dated: Brooklyn, New York

September 27th, 2012

By: E Bronzilla

Eimont Bronzini, Plaintiff

2251 81st Street, Apt C-1 Brooklyn, NY 11214

(718) 490 3741

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	i e
EIMONT BRONZINI	
(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)	(Civ. 2096 (KB))
CLASSIC SECURITY LLC	AFFIRMATION OF SERVICE
(In the space above enter the full name(s) of the defendant(s)/respondent(s)	 s).)
I, EIMONT BRONZINI, decle	are under penalty of perjury that I have
served a copy of the attached LETTER TO THE (do upon CASSIC SELLENTY LLC ANDREW SING (name of person served) ANDREW W. SINGER TANNEN BAUM HELPERN SYRAM (where you served do	JUDGE KB FORMEST-EXTENCION OF TIME cument you are serving)
CANCEL GERARATY LLC ANDREW SIN	whose address is
(name of person served)	Soo THRO WEIVE, N
ANDREW W. SINGER TAUNEN BAHM MELPERN HYRAI	CURE 2 MIRSHTMITCH. NY 10022"
by MHL (how you served document: For example - person	mal delivery, mail, overnight express, etc.)
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	SROOKLYN, NY sy, State 11214
	Code 118 490 37 11 Iephone Number